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COMPANY: USPTO	DATE: THURSDAY, AUGUST 24, 2006
FAX NUMBER: 571-273-8300	TOTAL NO. OF PAGES INCLUDING COVER: 20
PHONE NUMBER:	SENDER'S REFERENCE NUMBER: H0001343–5635
RE: Response to Non-Compliant Appeal Brief	RECIPIENTS REFERENCE NUMBER: 09/950,097

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BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of:	STYLINSKI et al.	Group Art Unit: 3713
Serial No.:	09/950,097	Examiner: Saadat, Cameron
Filed:	September 10, 2001	Confirmation No.: 2242
For:	PILOT INTERNET PRACTICE SYSTEM AND METHODS	
Attorney Docket No.:	H0001343-5635	

Certificate of Transmission
I hereby certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office, Fax No. 703-872-9306,
on 8/24/2006 (Date).
by Signature
Brett A. Carlson, Reg. No. 39,928

RESPONSE TO NOTIFICATION OF NON-COMPLIANT APPEAL BRIEF

MAILSTOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Arlington, VA 22313-1450

Commissioner:

We hereby respond to the Notification of Non-Compliant Appeal Brief mailed on July 24, 2006 in reference to our Appeal Brief originally filed on July 11, 2005 and previously corrected on October 27, 2005. In this Response, we provide a replacement Brief as requested in the Notification and as permitted under MPEP § 1205.3(B).

Applicants respectfully point out that the sections of the Appeal Brief requested in the Notification were not previously provided because they are not applicable in this appeal. Unfortunately, the Notification of Non-Compliant Appeal Brief mailed on September 27, 2005

did not contain any reference to the Sections requested in the July 24 Notification, or we would have provided this information at a much earlier date.

In any event, this Response is believed to be filed in a timely manner without any need for extensions of time. If for some reason this is not the case, however, Applicant hereby petitions for any extension of time and grants the Commissioner authorization to debit Deposit Account No. 50-2091 for any fees as may be required to consider this Response and/or to prevent abandonment of this application.

Respectfully submitted on behalf of assignee HONEYWELL INT'L. INC.,

Dated 8/24/2006

Brett A. Carlson
Registration No. 39,928
(480) 385-5060

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Customer No. 000128

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AUG 2 4 2006

BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of:	STYLINSKI et al.	Group Art Unit: 3713
Serial No.:	09/950,097	Examiner: Saadat, Cameron
Filed:	September 10, 2001	Confirmation No.: 2242
For:	PILOT INTERNET PRACTICE SYSTEM AND METHODS	
Attorney Docket No.:	H0001343--1638	

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Brett A. Carlson, Reg. No. 39,928

APPELLANT'S REVISED APPELLATE BRIEF FILED UNDER 37 C.F.R. § 1.192

MAILSTOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Arlington, VA 22313-1450

Commissioner:

The present invention relates to a new system that allows pilots to practice usage of highly sophisticated aircraft components from any conventional computer system with access to the Internet. Unlike traditional flight simulators that strive to reproduce the entire flight experience for the pilot, the present invention focuses on teaching the pilot how to program and/or operate a particular aircraft component such as a flight management system. The present invention therefore provides an environment for pilots to practice flight planning and/or other operations performed on very specialized aircraft components without requiring the student to travel to a simulator or to possess specialized computing hardware.

In the Final Office Action, the Examiner refused to allow our patent application, stating that a skilled engineer would be motivated to choose certain elements described in four separate references identified by the Examiner, and that these elements, when combined, would make our invention obvious. With all due respect to the Examiner, the basis for selecting the particular elements found in the four separate references is, at best, dubious without the benefit of our claims and a substantial amount of impermissible hindsight. More importantly, even if the four references were combined with each other, the resulting combination would still fail to disclose the inventions that are presently claimed. We appealed the Examiner's final decision to the Board of Patent Appeals and Interferences because the Final Office Action does not set forth an adequate basis for rejecting our invention.

Each of the items required by 37 C.F.R. § 1.192(c) are set forth below:

1. Real Party in Interest

The real party in interest for this invention is Honeywell International Inc., a Delaware Corporation.

2. Related Appeals and Interferences

There are no related Appeals or Interferences.

3. Status of Claims

Claims 1, 4, 6-7, 9-11, 13-16 and 18-22 are pending in the present Appeal, with claims 1, 7 and 15 being independent claims. Claims 2-3, 5, 8, 12 and 17 have been cancelled in Applicant's prior Responses, and are no longer pending. Claims 1, 4, 6-7, 9-11, 13-16 and 18-22 are under appeal, and a clean copy of the appealed claims is appended to this Brief.

4. Status of Amendments

Applicant submitted a Response under 37 C.F.R. 1.116 on March 29, 2005 amending claims 1, 7 and 15 to restore broader earlier-pending language. The Examiner has indicated in the Advisory Action dated April 25, 2005 that this Amendment was entered for purposes of Appeal.

5. Summary of the Claimed Subject Matter

This Application includes three independent claims (claims 1, 7 and 15), examples of which are summarized below.

One embodiment encompassed by independent claim 1 and described with reference to FIGS. 1-2 and associated text (except where noted) relates to a content-providing system **[130]** for allowing a remotely-located user operating a general-purpose network browser program **[206]** having a user interface **[e.g. FIGS. 5A-B]** displayed by a client computer **[102]** to interact with a flight simulator program **[300, 310 in FIGS. 3-4]** via a public digital network **[106]**. The system comprises a gateway **[132]** having an interface **[para. 0025, or p. 11, line 20 – p. 12, line 2 of the originally-filed Specification]** to said public digital network, a database **[116]** in communication with said gateway, and at least one general-purpose host computer system **[134]** executing a server portion **[228]** of said flight simulator program on a simulation card **[136]**, wherein the server portion comprises executable code that is based upon executable code used in an actual aircraft component **[para. 0028, or p. 12, line 14-p.13, line 6]**.

Continuing with the exemplary embodiment of claim 1 but with primary reference now to FIG. 3 and associated text, said gateway in the above embodiment is operable to receive a request **[step 302]** via the public digital network for a connection to said server portion from the general-purpose network browser executing on the client computer, to authenticate **[step 308]** the request based upon information contained in the database, and to establish a connection **[step 310]** over the public digital network between said server portion and a client portion of said flight simulator program executing on the client computer following a successful authentication. Primary processing for said flight simulator takes place at said server portion, and updates to the user interface displayed on the client computer are processed at said client portion **[*see, e.g.*, para. 0032 at p. 15, line 10 – p. 16, line 2]**.

Another embodiment encompassed by independent claim 7 provides access via a public digital network **[106]** from a client computer **[102]** to a server portion **[228]** of a flight simulator program at a content-providing system **[130]** having a database **[116]**, wherein the client computer comprises a client portion **[104]** of said flight simulator program and a general purpose network browser **[206]** having a user interface **[e.g. FIGS. 5A-B]** displayed on the client computer. With primary reference now to FIGS. 3-4 and associated text, the exemplary method **[300]** comprises receiving a request for a connection **[step 302]** from the network browser via

said public digital network at a gateway [132] associated with said content-providing system, wherein the request comprises an authentication credential **[para. 0036 at p. 16, line 21 through p. 17, line 12]**. The authentication credential is correlated **[step 308]** with data stored in the database to verify that said client portion is permitted to access said server portion **[para. 0038 at p. 17, line 17 through p. 18, line 2]**. A connection is established between said client portion and said server portion across said public digital network via said gateway in response to the request **[step 310]**. With primary reference now to FIG. 4, the method further comprises executing said server portion at said content-providing system **[step 408]**, wherein the server portion comprises executable code executing on a simulator card [136] residing in a general purpose host computer **[134]**, and wherein the executable code is based upon executable code used in an actual aircraft component **[para. 0028, or p. 12, line 14-p.13, line 6]**. Instructions are provided from said server portion to said client portion, said instructions corresponding to an update to the user interface executing at said client computer **[para. 0043 at p. 19, line 15 – p. 20, line 7]**.

With primary reference again to FIGS. 1 and 2, an additional embodiment encompassed by independent claim 15 encompasses a system **[130]** for providing access over a network **[106]** between a server application **[228]** and a remotely-located client computer **[102]** executing a general-purpose network browser **[206]** and a client application **[104]**. The system comprises a database **[116]** configured to store a plurality of records, and also comprises a plurality of cards[136], each of said plurality of cards residing in a general-purpose host computer **[134]** and comprising a card processor **[220]** configured to execute a copy **[224]** of said server application, wherein the server application comprises executable code that is based upon executable code used in an actual aircraft component **[para. 0028, or p. 12, line 14-p.13, line 6]**. A gateway **[132]** in communication with said network, with the database, and with each of said plurality of cards is configured to provide access between said client application and the copy of said server application executing on one of said plurality of card processors via said network **[para. 0043 at p. 19, line 15 – p. 20, line 7]**, and wherein said access is based upon comparison of a credential provided from said browser with one of the records stored in the database **[para. 0038 at p. 17, line 17 through p. 18, line 2]**.

6. Grounds of Rejection to be Reviewed on Appeal

The sole grounds of rejection to be reviewed upon Appeal is whether claims 1, 7 and 15 are unpatentable under 35 USC § 103 over the cited combination of Huffman, Lin, Darago, Salisbury and "additional information known in the art".

7. Argument

To prove a case of obviousness, as the Examiner has attempted in this application, three criteria must be met.[1] First, there must be some suggestion or motivation to combine the teachings of the various references. Secondly, there must be a reasonable expectation of success. Third, the combination of prior art references must teach or suggest all of the limitations of the Applicant's claims. In the present case, even if an ordinarily skilled person would be motivated to combine the four references identified by the Examiner, this combination would still fail to disclose all of the limitations contained in our claims. We will first address the shortcomings of the cited art, and then turn to the legal insufficiency of the rejection itself.

(1) ***Issue #1: Does the cited combination of references in fact disclose a gateway and a simulation card executing software based upon an actual flight component, as our claims require?***

The Examiner has cited a combination of four references against all of our claims. The primary reference, US Patent 6,053,736 ("Huffman") describes a flight simulator specially-built for AWACS flight training. The secondary reference, US Patent 6,478,581 ("Lin"), describes a cabling scheme that allows a control display navigation unit (CDNU) to be wired into a flight simulator. The remaining references (US Patent No. 6,170,014 ("Darago") and the Salisbury publication) relate to networked courseware distribution and internet browsers, respectively. The Examiner then asserts that it would be obvious to combine the four references to arrive at Applicant's claims.

With due respect to the Examiner, the combination resulting from an aircraft simulator, a wiring harness, a courseware server and an internet browser would fall significantly short of our claimed inventions. None of the references, for example, disclose a "gateway" having all the aspects recited in our claims, or a simulator card that executes software based upon executable code used in an actual aircraft component. Because none of the references individually disclose

either of these elements, even the combination of the four references cannot disclose every aspect of our claimed inventions.

(a) *The "Gateway"*

None of the references, taken alone or in combination, disclose a "gateway" that performs each of the functions required by our claims. In particular, no reference discloses a gateway that "*is operable to receive a request via the public digital network for a connection to said server portion from the general-purpose network browser executing on the client computer, to authenticate the request based upon information contained in the database, and to establish a connection over the public digital network between said server portion and a client portion of said flight simulator program executing on the client computer following a successful authentication*", as required by Applicant's claim 1.

Each of the four Office Actions has claimed that the "gateway" element present in our claims is described within the Huffman reference. Despite our repeated requests for clarification, however, the Examiner has yet to identify a specific element in Huffman that performs the gateway functions. To the contrary, the Huffman reference is not intended to perform a gateway function as that term is delineated in our claims. The Huffman system is clearly described as "a multi-mode single platform system"[2] similar to the standalone aircraft simulators described in our Specification at page 2, lines 1-10. The student sits at a specialized console (element 11 in FIG. 1), and highly specialized computer systems simulate the AWACS flight experience. The reference does not relate to providing a simulation to a user across a network in any manner, and therefore makes no mention whatsoever of a "gateway" or public network.

The closest allusion to a "gateway" element in the Huffman reference is found at col. 4, lines 49-55.[3] Even this limited disclosure simply describes an interface (element 16c in FIG. 1) that allows the simulator to communicate with another stand-alone flight simulator manufactured by the McDonnell Douglas corporation via a local area network.[4] Huffman therefore does not disclose a gateway as we have used this term, nor does the reference mention the various features

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[1] Graham v. John Deere Co., 383 U.S. 1,17, 148 USPQ 459, 467 (1966)
[2] *See, e.g.*, Huffman col. 1, lines 15-16; col. 2, lines 5-6 and 46-49.
[3] This passage was cited in the Office Action dated October 21, 2003.
[4] Huffman does describe the DIS networking feature in more detail in conjunction with FIG. 4, but even this discussion does not relate to a "gateway" or providing access over a public network, as recited in our claims.

(e.g. user authentication, establishing connections to conventional browsers, etc.) of the gateway recited in our claims.

The most recent Final Office Action dated February 23, 2005 does state in the "Response to Arguments" Section (i.e. not in the rejection of the claims) that the Examiner does not, in fact, rely upon the Huffman reference to provide the "gateway" element, but rather upon the Darago reference.[5] Besides being contrary to the actual rejection contained within the body of the Office Action, this assertion is similarly not borne out by the reference. In particular, the Darago reference is not concerned with a gateway that *establish[es] a connection over the public digital network between said server portion and a client portion of said flight simulator program executing on the client computer following a successful authentication"*. To the contrary, the Darago disclosure simply relates to a courseware server capable of enforcing intellectual property licensing requirements upon classroom software.[6] This licensing feature does not disclose the particular gateway features contained within our claims, particularly with regard to establishing connections between client and server portions of a flight simulation program. The Examiner has never asserted that the "gateway" feature is found within either the Lin or Salisbury references, and indeed neither of these references even remotely provide gateway functionality as described by our claims.

As a result, none of the cited references expressly or impliedly disclose at least:

> *[a] gateway operable to receive a request via the public digital network for a connection to said server portion from the general-purpose network browser executing on the client computer, to authenticate the request based upon information contained in the database, and to establish a connection over the public digital network between said server portion and a client portion of said flight simulator program executing on the client computer following a successful authentication.*

Because none of the individual references disclose a gateway having all of these characteristics, even a combination of the four references would fail to disclose at least this element of the invention.

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[5] See Final Office Action dated February 23, 2005 at page 8, line 22. This is in stark contrast to the actual rejection of the claim language provided at, for example, page 3, line 17 of the same document.

[6] The actual rejections contained within the Office Actions cite Darago as disclosing an authentication database.

(b) *Software "Based Upon Executable Code Used In An Actual Aircraft Component"*

None of the references, taken alone or in combination, disclose a simulation card that executes software that is *based upon executable code used in an actual aircraft component* as required by our claims. As noted above, the pilot/user is able to interoperate with a very accurate representation of an actual aircraft component (e.g. a flight management system) within a conventional browser operating on a conventional computer via the Internet or a similar public network. Moreover, claim 1 recites that the server portion of the system operates on a general purpose computer having one or more simulation cards executing software code that is based upon the code used in an actual aircraft component. By executing component code on a card residing within a conventional general-purpose computer, the cost of the simulation is significantly reduced (compared to standalone flight simulators such as those shown in the Huffman reference) without sacrificing the features of the component made available to the remote user.

The various Office Actions acknowledge that the primary reference does not include this feature of the invention, but alleges that this element is described in US Patent No. 6,478,581 ("Lin"). The Lin reference does not disclose simulation cards in any manner, but rather describes a wiring technique for connecting an actual aircraft component to a standalone flight simulator. **This point is never disputed by the Examiner.** Indeed, the only sections of Lin ever cited by the Examiner[7] contain no mention whatsoever of software "based upon executable code used in an actual component", but rather relate to adapting the actual component itself to work in the simulation environment.[8]

Even if the Huffman and Lin references were combined, then, the result would be a standalone flight simulator with an actual cockpit display navigation unit (CDNU) wired into the simulator.[9] *Even this combination fails to disclose a simulator card with software code based upon code used in an actual component, as this language is used in our claims.* The Examiner has never alleged that the Darago and Salisbury references contain any mention of this feature, nor do either of these references in fact have any disclosure relevant to this aspect of our

[7] Lin col. 1, lines 19-25; col. 2, lines 20-25 and 62-64.
[8] See Lin at col. 1, lines 59-61.

invention. As a result, even a combination of the four references fails to anticipate *a server portion of said flight simulator program on a simulation card, wherein the server portion comprises executable code that is based upon executable code used in an actual aircraft component* as this language is used within our claims.

To reiterate, then, none of the references cited by the Examiner disclose at least several aspects of our claimed inventions. Because none of the reference disclose at least a "gateway" and "a simulator card executing code based upon code used in an actual aircraft component" as recited within each of our independent claims, even the combination of the four references would fail to fairly anticipate these aspects of our invention. The cited combination of references therefore does not in fact disclose the inventions set forth in our claims, as required to sustain the Section 103 rejection.

(2) ***Issue #2:*** ***Would an ordinarily skilled person be motivated to combine the four separate references to duplicate our invention without the benefit of our claims and impermissible hindsight?***

The Examiner acknowledges that our inventions are not disclosed within a single prior art reference, instead rejecting our invention based upon a combination of four separate references under Section 103. Applicant respectfully disagrees that the combination of Huffman/Lin/Darago/Salisbury and "additional information known in the art" would be obvious. Indeed, although the Examiner could theoretically combine an infinite number of references if done so properly, the mere fact that the Examiner requires so many references to reject even a single three-element claim is highly suspect. At the very least, the particular reasoning provided by the Examiner is inadequate to sustain a Section 103 rejection, as it fails to provide a convincing reason as to why a skilled artisan would have made the proposed combination without using our claims as a guide to making the combination.

It is well-settled that the Examiner must establish a factual basis to support the legal conclusion of obviousness using the determinations set forth by the United States Supreme Court in Graham v. John Deere Co.,[10] and must provide a reason why one having ordinary skill in the

[9] It is well-settled that "it is impermissible within the framework of section 103 to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests". In re Wesslau, 353 F.2d 238, 147 USPQ 391 (CCPA 1965).
[10] 383 U.S. 1,17, 148 USPQ 459, 467 (1966).

pertinent art would have been led to modify the prior art or to combine prior art references to arrive at the claimed invention. This reasoning must stem from some teachings, suggestions or implications in the prior art as a whole, or from knowledge generally available to one having ordinary skill in the art.[11] The case law emphasizes the need for specificity in setting forth this reasoning,[12] and must explain why a skilled artisan, with no knowledge of the claimed invention, would have selected these components for combination in the manner claimed.[13]

In the most recent Final Office Action, the Examiner states that citations of motivation statements derived from the references have been provided, but this is simply not accurate. More particularly, the Examiner has stated that it would be obvious to combine the Huffman and Lin references "to simulate real avionics equipment in a flight simulator environment, thereby providing a more realistic simulation for providing training", citing the same sections of Lin that were shown to be irrelevant above. Noting that the Huffman/Lin combination still failed to disclose the claimed invention, the Examiner states that it would be obvious to modify the Huffman/Lin storage unit[14] by adding the Darago database "in order to protect licensed content, and to limit use of the content to registered users that are charged accordingly for usage". Further noting that even this combination fails to anticipate our entire invention, the Examiner states that it would be obvious to combine the Salisbury browser into the Huffman/Lin/Darago combination "to deliver a 3D simulation from a web browser". Still further, the Examiner notes that even this combination of Huffman/Lin/Darago/Salisbury fails to disclose the public digital network aspects of our claims, but that this aspect would be "notoriously well known in the art...to provide simulation and training to users at a number of distributed sites, thereby overcoming geographical limitiations".[15] None of these reasons are sufficient to sustain a prima facie case of obviousness.

MPEP § 2143.01 sets forth several bases for suggesting a particular combination. These reasons include the nature of the problem to be solved, the particular teachings of the prior art, and the knowledge of one of ordinary skill in the art. The particular reasons cited by the Examiner, however, simply re-state the benefits provided by our invention (e.g. "to provide a

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[11] *See, e.g.*, In re Sang Su Lee, 00-1158 (Fed. Cir. 2002), and cases cited therein.
[12] Id. *See also* In re Kotzab, 217 F.3d 1365, 1371 (Fed. Cir. 2000).
[13] Id.
[14] It is not understood why this "storage unit" is relevant to any of our claims.
[15] As a factual matter, Applicant disputes that suitable for use in actual pilot training are widely available over public networks such as the Internet, as the Examiner asserts in the Final Office Action.

more realistic simulation", "to limit the use of content to registered users", "to provide a 3D display"[16]), and in any event fail to apply the proper standard set forth in the MPEP. That is, even if the Examiner's statements about the benefits provided by the combination are true, these statements are largely irrelevant, since "anticipated benefits" is not a basis for the motivation to combine references that is permitted by MPEP 2143.01.[17]

Further, the Examiner has impermissibly excluded the bulk of the cited references, instead picking and choosing only those aspects of the references believed to be relevant to our claims. To use the Huffman/Lim combination as an example, the Examiner ignores the primary thrust of the Lin disclosure (i.e. a wiring harness for connecting an actual CDNU into a standalone simulator) in citing only selected language against Applicant's claims. Similar statements could be made with regard to the Darago and Salisbury references as well. Rather than considering the references as a whole, then, the Examiner has employed a liberal dose of hindsight, using our claims as a blueprint, and then picking and choosing only certain aspects of the references to the exclusion of other parts necessary for a full appreciation of the cited references. This is not permissible in sustaining a Section 103 rejection.[18]

Conclusion of Argument: Focusing again the three primary requirements of a Section 103 obviousness rejection, it is apparent that the Examiner has failed to set forth a legally-sufficient motivation for the suggested combination of references. Moreover, even if the four references were combined with ordinary knowledge as suggested by the Examiner, the resulting combination would still fail to teach all of the limitations of our claims. For these reasons, we very respectfully request that the Board refuse to sustain the Examiner's rejections, and instead pass our patent application to issue.

[16] Note that our claims do not require a 3D display, so the motivation in at least this case is entirely irrelevant.
[17] *See also* In re Rouffet, 149 F.3d 1350, 1357 (Fed. Cir. 1998).
[18] In re Wesslau at 241; *see also* In re Kamm, 452 F.2d 1052, 1057, 172 USPQ 298, 301-02 (CCPA 1972).

This Brief is believed to be filed in a timely manner without any need for extensions of time. If for some reason this is not the case, however, Applicant hereby petitions for any extension of time (e.g. any extension from the date that the Notice of Appeal and/or the Final Office Action were mailed) and grants the Commissioner authorization to debit Deposit Account No. 50-2091 for any fees as may be required to consider this Brief and/or to prevent abandonment of this application.

Respectfully submitted on behalf of assignee HONEYWELL INT'L. INC.,

Dated 8/24/2006

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Customer No. 000128

8. Claims Appendix

Claim 1 (previously presented): A content-providing system for allowing a remotely-located user operating a general-purpose network browser program having a user interface displayed by a client computer to interact with a flight simulator program via a public digital network, said system comprising:

a gateway having an interface to said public digital network;

a database in communication with said gateway; and

at least one general-purpose host computer system executing a server portion of said flight simulator program on a simulation card, wherein the server portion comprises executable code that is based upon executable code used in an actual aircraft component;

wherein said gateway is operable to receive a request via the public digital network for a connection to said server portion from the general-purpose network browser executing on the client computer, to authenticate the request based upon information contained in the database, and to establish a connection over the public digital network between said server portion and a client portion of said flight simulator program executing on the client computer following a successful authentication, wherein primary processing for said flight simulator takes place at said server portion, and wherein updates to the user interface displayed on the client computer are processed at said client portion.

Claims 2-3 (cancelled).

Claim 4 (previously presented): The content-providing system of claim 1 wherein said database comprises billing information, and wherein the gateway is further configured to update the billing information in response to the connection being established.

Claim 5 (cancelled).

Claim 6 (previously presented): The content providing system of claim 1 wherein said actual aircraft component is a flight management system (FMS).

Claim 7 (previously presented): A method of providing access via a public digital network from a client computer to a server portion of a flight simulator program at a content-providing system having a database, wherein the client computer comprises a client portion of said flight simulator program and a general purpose network browser having a user interface displayed on the client computer, the method comprising:

receiving a request for a connection from the network browser via said public digital network at a gateway associated with said content-providing system, wherein the request comprises an authentication credential;

correlating said authentication credential with data stored in the database to verify that said client portion is permitted to access said server portion;

establishing a connection between said client portion and said server portion across said public digital network via said gateway in response to the request;

executing said server portion at said content-providing system, wherein the server portion comprises executable code executing on a simulator card residing in a general purpose host computer, wherein the executable code is based upon executable code used in an actual aircraft component; and

providing instructions from said server portion to said client portion, said instructions corresponding to an update to the user interface executing at said client computer.

Claim 8 (cancelled).

Claim 9 (original): The method of claim 7 further comprising the step of monitoring a time of usage at said content-providing system.

Claim 10 (original): The method of claim 9 further comprising the step of maintaining information at said content-providing system, wherein said billing information is correlated to said time of usage.

Claim 11 (original): The method of claim 7 wherein said program is an aircraft simulation program.

Claim 12 (cancelled).

Claim 13 (previously presented): The method of claim 11 wherein the aircraft component comprises a flight management system.

Claim 14 (original): The method of claim 13 wherein said program is stored on a card executing on a host computer associated with said content-providing system.

Claim 15 (previously presented): A system for providing access over a network between a server application and remotely-located client computer executing a general-purpose network browser and a client application, said system comprising:

a database configured to store a plurality of records;

a plurality of cards, each of said plurality of cards residing in a general-purpose host computer and comprising a card processor configured to execute a copy of said server application, wherein the server application comprises executable code that is based upon executable code used in an actual aircraft component; and

a gateway in communication with said network, with the database, and with each of said plurality of cards, wherein said gateway is configured to provide access between said client application and the copy of said server application executing on one of said plurality of card processors via said network, and wherein said access is based upon comparison of a credential provided from said browser-with one of the records stored in the database.

Claim 16 (original): The system of claim 15 wherein each of said plurality of computer applications comprises an aircraft simulation program.

Claim 17 (cancelled).

Claim 18 (previously presented): The system of claim 15 wherein said actual aircraft component is a flight management system.

Claim 19 (original): The system of claim 15 wherein said network is a distributed interactive simulation (DIS) network.

Claim 20 (original): The system of claim 15 wherein said network is a high level architecture (HLA) network.

Claim 21 (original): The system of claim 19 wherein said system is connected through said IDS network to a distributed mission training (DMT) scenario.

Claim 22 (original): The system of claim 20 wherein said system is connected through said HLA network to a distributed mission training (DMT) scenario.

9. EVIDENCE APPENDIX

No evidence pursuant to 37 C.F.R. §§ 1.130, 1.131, or 1.132 has been entered by the Examiner or relied upon by Appellant in the instant appeal beyond that which is already contained in the as-filed application, as delineated in the Arguments section of this Brief.

10. RELATED PROCEEDINGS APPENDIX

As there are no related appeals and interferences set forth in Section 2 above, there are also no decisions rendered by a court or the Board of Patent Appeals and Interferences that are related to the instant appeal.